

According to the Specification at p. 5, last carryover paragraph, the distance between two documents may be determined by multiplying two column vectors and taking the sum of the products, where a greater distance between the two documents reflects a greater degree of similarity. The specification goes on to say
5 (p. 6, first carryover paragraph) that, "the choice of functions may be made on pragmatic grounds.... The distance measure does not correspond to the criteria of a topological distances."

Although the specification does not expressly address the use of an inverse relationship for this distance, such a function ($1/x$) is implicitly considered as this
10 function is well known in the art. Furthermore, the first carryover paragraph on page 6 alludes to an inverse relationship being considered where it states, "the distance from one document to itself gives a maximum value instead of zero" In other words, since the document distance is giving a measure to the degree of similarity between documents, this sentence suggests alternative approaches that could be used for
15 measurement of a document comparison that is compared to an identical document, i.e., that such a comparison could produce a result of zero, or the inverse of zero (infinity, or, in a practical application, some maximum value).

Thus, although the specification does not expressly describe this inverse relationship, an inverse relationship is known to one of ordinary skill in the art, and
20 such a relationship is further inferentially described.

For these reasons, the Applicants respectfully suggest that this claim language is enabled and ask that the 35 U.S.C. §112 rejection be withdrawn from the application.

35 U.S.C. §102(e), Claims 1-17 Anticipation by Pirolli, et al.

2. *Pirolli does not anticipate the present invention because its strength associations are displayed in the links between documents and not within the documents themselves, and Pirolli does not focus on a relationship to a central*
5 *document for display purposes.*

According to Pirolli, “[representations constructed include] Graph representations of the strength of association of Web pages to one another which are used in the spreading activation...” 5/66 - 6/1. The display of these representations of strength of association are described in Pirolli, referring to Fig. 10,
10 as being “the widths of the lines connecting the various pages 1001-1007 [which] is an indication of how similar the pages are.” 11/13-15. Thus, Pirolli’s display focuses on a between-document relationship and does not utilize the concept of a starting document for display purposes.

Claim 1 of the present invention requires, in part, that, “[the invention] utilizes
15 said graphical display program to produce and display respective symbols of said other documents related to said starting document” [emphasis added]. An exemplary embodiment of this display can be seen in Fig. 1 in which the degree of relationship of documents to the starting document is represented by the shading used on the document itself. This is different from Pirolli because it permits the
20 simultaneous display of a structure of links and a structure of similarities belonging to the same originating document within a common representation of both link structure and similarity structure. Pirolli does not provide such a simultaneous display, nor could it be modified to produce such a display as it’s display does not focus on a single starting document.

For these reasons, the Applicant asserts that the present invention is clearly distinguished over the Pirolli reference, and respectfully requests that the Examiner withdraw the §102 rejection from the present application.

CONCLUSION

5 Inasmuch as each of the objections have been overcome by the arguments and discussion presented above, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

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Respectfully submitted,

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25 Commissioner for Patents, Washington, D.C. 20231 on April 5, 2002.

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